IN WITNESS WHEREOF, the undersigned have caused this Settlement Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:

James Frey

Date: 1/2/07

James Frey
Big Jim Industries, Inc.

Date: 1/2/07

Maya Frey

Date: 1/2/07

Derek J. Meyer
McDermott Will & Emery LLP
227 West Monroe Street, Suite 4400
Chicago, Illinois 60606
Attorney for the Frey Defendants

Date: 1/2/07

FOR THE RANDOM HOUSE DEFENDANTS:

Robert Sorrentino
Senior Vice President, Taxes, Random House, Inc.

Date:

Robert Sorrentino
President, Doubleday & Company, Inc.

Date:

Robert Sorrentino
Vice President, Taxes, Random House VG, Inc.

Date:

Mark B. Blocker
Sidley Austin LLP
One South Dearborn
Chicago, Illinois 60603
Attorney for the Random House Defendants

Date:

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IN WITNESS WHEREOF, the undersigned have caused this Settlement Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:

James Frey

Date:

James Frey
Big Jim Industries, Inc.

Date:

Maya Frey

Date:

Derek J. Meyer
McDermott Will & Emery LLP
227 West Monroe Street, Suite 4400
Chicago, Illinois 60606
Attorney for the Frey Defendants

Date:

FOR THE RANDOM HOUSE DEFENDANTS:

Robert Sorrentino
Senior Vice President, Taxes, Random House, Inc.

Date: 12/15/06

Robert Sorrentino
President, Doubleday & Company, Inc.

Date: 12/15/06

Robert Sorrentino
Vice President, Taxes, Random House VG, Inc.

Date: 12/15/06

Mark B. Blocker
Sidley Austin LLP
One South Dearborn
Chicago, Illinois 60603
Attorney for the Random House Defendants

Date: 12/28/2006

FOR THE PLAINTIFFS:

Marcia Vedral
Plaintiff Marcia Vedral

Date: 12/6/06

Larry D. Drury
Larry D. Drury Ltd.
205 W. Randolph Street, Suite 1430
Chicago, Illinois 60606
Proposed Co-Lead Class Counsel
Attorney for Plaintiff Marcia Vedral

Date: 12-6-06

Michele Snow
Plaintiff Michele Snow

Date: 12-6-06

Evan J. Smith, Esquire
Brodsky & Smith, LLC
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Bala Cynwyd, PA 19004
(610) 667-6200
Proposed Co- Lead Class Counsel
Attorney for Plaintiff Michele Snow

Date: 12-6-06

Plaintiff Jennifer Cohn

Date:

Thomas Mullaney
708 Third Avenue, Suite 2500
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Phone: (212) 223-0800
Liaison Class Counsel
Attorneys for Plaintiff Jennifer Cohn

Date:

Plaintiff Ann Marie Strack

Date:

Thomas A. Zimmerman, Jr.
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100 West Monroe Street, Suite 1300
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Attorney or Plaintiff Ann Marie Strack

Date:

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral

Date:________________

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Larry D. Drury Ltd.
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Date:________________

Plaintiff Michele Snow

Date:________________

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Attorney for Plaintiff Michele Snow

Date:________________

Plaintiff Diane Marolda

Date: 12/7/06

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Phone: (212) 223-0800
Liaison Class Counsel
Attorneys for Plaintiff Diane Marolda

Date: 12.5.2006

Plaintiff Ann Marie Strack

Date:________________

Thomas A. Zimmerman, Jr.
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100 West Monroe Street, Suite 1300
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Attorney or Plaintiff Ann Marie Strack

Date:________________

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral

Date:________________

Plaintiff Michele Snow

Date:________________

Larry D. Drury
Larry D. Drury Ltd.
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Attorney for Plaintiff Marcia Vedral

Date:________________

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Date:________________

Plaintiff Jennifer Cohn

Date:________________

Plaintiff Ann Marie Strack

Date: 12-8-06

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Thomas A. Zimmerman, Jr.
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Attorney or Plaintiff Ann Marie Strack

Date: 12-11-2006

Plaintiff Jimmy Floyd

Date: 1/4/07

Alan S. Ripka
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New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: December 5, 2006

Plaintiff Jill Giles

Date:________________

Alan J. Statman
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Date:________________

Plaintiff Pilar More

Date:________________

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Attorneys for Plaintiff Pilar More

Date:________________

Plaintiff Shera Paglinawan

Date:________________

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Date:________________

Plaintiff Sara Brackenrich

Date:________________

Vincent L. DiTommaso
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Attorney for Plaintiff Sara Brackenrich

Date:________________

Plaintiff Jimmy Floyd

Date:________________

Alan S. Ripka
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Attorney for Plaintiff Jimmy Floyd

Date: 11/29/06

Plaintiff Pilar More

Date: 11/29/06

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Date:________________

Plaintiff Sara Brackenrich

Date:________________

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Attorney for Plaintiff Sara Brackenrich

Date:________________

Plaintiff Jill Giles

Date:________________

Alan J. Statman
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Attorneys for Plaintiff Jill Giles

Date:________________

Plaintiff Shera Paglinawan

Date:________________

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Date:________________

Plaintiff Jimmy Floyd

Date:_______________

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Date:_______________

Plaintiff Pilar More

Date:_______________

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Attorneys for Plaintiff Pilar More

Date:_______________

Plaintiff Sara Brackenrich

Date: 20 Nov. 06

Vincent L. DiTommaso
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Plaintiff Jill Giles

Date:_______________

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Attorneys for Plaintiff Jill Giles

Date:_______________

Plaintiff Shera Paglinawan

Date:_______________

Plaintiff Wendy Shaw

Date:_______________

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Date:_______________

Plaintiff Jimmy Floyd

Date:________________

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Date:________________

Plaintiff Pilar More

Date:________________

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Date:________________

Plaintiff Sara Brackenrich

Date:________________

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Date:________________

Jill Giles / by her attorney [signature]

Plaintiff Jill Giles

Date: 12-7-06

[signature]

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Date: 12-7-06

Plaintiff Shera Paglinawan

Date:________________

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Date:________________

Plaintiff Jimmy Floyd

Date:

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Date:

Plaintiff Pilar More

Date:

Thomas E. Pakenas
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Chicago, Illinois 60661
Attorneys for Plaintiff Pilar More

Date:

Plaintiff Sara Brackenrich

Date:

Vincent L. DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jill Giles

Date:

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Date:

Plaintiff Shera Paglinawan

Date: 3 Dec. 2006

Plaintiff Wendy Shaw

Date:

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Date: 12 · 3 · 2006

Plaintiff Jimmy Floyd

Date:

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Date:

Plaintiff Pilar More

Date:

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Date:

Plaintiff Sara Brackenrich

Date:

Vincent L. DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jill Giles

Date:

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Date:

Plaintiff Shera Paglinawan

Date:

Plaintiff Wendy Shaw

Date: 12/2/06

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Attorney for Plaintiff Shera Paglinawan

Date: